EastWaterWayComments

From: drupal_admin@epa.gov on behalf of US EPA <drupal_admin@epa.gov>
Sent: Wednesday, August 02, 2023 12:06 PM
To: EastWaterWayComments
Subject: East Waterway Proposed Plan Comment Form

Submitted on August 2, 2023 3:06 pm EDT

Submitted by: Anonymous

Submitted values are:

Submitted by (optional):
Other

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Comments (required)
Thank you for the opportunity to review and comment on the East Waterway Proposed Plan. The East Waterway is an area of cultural significance to the Duwamish Tribe. This area, which was part of a complex network of tidelands and sloughs, was highly traveled and used by the Duwamish and other peoples, fish, waterfowl, and other animals. Because of this significance to culture past and present, the Tribe is keenly interested in the EPA plan for cleanup of the waterway and notes the following:

The Tribe strongly prefers EPA's intent to design the remedial actions such that sediment PCB concentrations can reach 2 ppb in the East Waterway Operable Unit (EW OU). Maintaining this cleanup level should be among EPA's top priorities as the remedial actions are developed.
The Tribe is also concerned about the potential for cultural resources to be encountered during dredging. If it is safe and feasible to do so, the Tribe would prefer that archaeological monitoring occurs during activities that disturb sediment below fill. In the cases that archaeological monitoring is impossible or unsafe given the contamination, the Tribe would accept an IDP (inadvertent discovery plan) in case an artifact is encountered. If any archaeological work occurs, the Tribe would like notification and the opportunity to be present on site during the work.
The Tribe is in favor of the preferred alternative, with several questions and comments:

♣ It was not clear from the Feasibility Study the rate at which contaminants left in place (under caps or otherwise) will

return to background levels. Are contaminants left in areas of monitored natural recovery expected to reach general cleanup levels by the end of the project, or will they take decades? What influences the rate of recovery? Lacking this information made it difficult for the Tribe to evaluate the various alternatives. The Tribe requests clearer timelines be communicated as the cleanup levels are set and remedial actions are developed, even with the expectation that these timelines will include uncertainties.

♣ The definition of "long term" was not clear (20 years? 80 years?). This definition has profound consequences given the rate of expected impacts of climate change (particularly an increase in extreme flood events), earthquake risks (e.g., >80% chance of a Nisqually-style event in the next 50 years), and the plan for a new light rail extension crossing the Duwamish, among other changes that will occur in the coming decades.

♣ It was not clear from the Feasibility Study the extent to which the proposed sediment caps will be effective and resilient to repeated scour from propwash, floods, tides, tsunamis, etc. over the "long term." What might be the effects in the EW OU and to adjacent waterbodies and habitats if scour removes capping sediments and deposits them elsewhere (e.g., in the basin of Elliott Bay or main basin of Puget Sound)?

♣ The Tribe would like more information about the possible interaction between the planned Sound Transit light rail development and the EPA cleanup. Is there a chance that exploration for the Sound Transit development will disturb sediments at the EW OU?

♣ During remedial design, the Tribe recommends that effects of tsunamis be considered using the latest models prepared by the State of Washington, which model inundation depths of up to 44 feet and current velocities over 25 knots within the EW OU (Dolciamascolo et al., 2022). This model represents an earthquake on the Seattle Fault Zone (which crosses the remediation area), though other tsunami sources are also possible (e.g., other crustal faults in Puget Sound, submarine landslides, etc.).

♣ An earthquake can also be expected to produce liquefaction, lateral spreads, or other ground failure at or adjacent to the OW, as occurred on Harbor Island during all of the historical deep earthquakes: in 2001, 1949, and 1965. These processes would disturb sediments and have the potential to bring buried sediments and groundwater to the surface. The Tribe appreciates the inclusion of these considerations in the EPA reports up to this point and recommends that a robust earthquake response plan be in place given the >80% chance that a similar event occurs during the remediation period or in the decades after. The Tribe prefers alternatives and strategies for cleanup that reduce the likelihood that earthquakes, tsunamis, or other such events will expose people or wildlife to contaminated sediments in the future.

♣ The Tribe would like more information about where the dredged sediment will be moved to.

Indigenous people in this area enjoyed and subsisted from the clean environment at this delta for thousands of years prior to its contamination. The Duwamish Tribe cannot stress highly enough the innumerable values of a thorough, effective, and long-lasting cleanup.